

Exhibit E

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ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PHILIP FEI, on behalf of : 07 Civ. 8785
himself and classes of :
those similarly situated, :
Plaintiff, :
-against- :
WEST LB AG, :
Defendant : Rule 30(b)(6)

Tuesday, March 18, 2008

Pretrial examination of LISA CARRO, held in the
offices of Outten & Golden, 3 Park Avenue, 29th Floor,
New York, New York, commencing at 9:05 a.m., on the
above date, before Mickey Dinter, Registered
Professional Reporter, Certified Shorthand Reporter
and Notary Public for the State of New York.

U.S. LEGAL SUPPORT

1 Penn Plaza

Suite 1410

New York, New York 10119

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1 A P P E A R A N C E S :

2

OUTTEN & GOLDEN, ESQS.

3 BY: LINDA NEILAN, ESQUIRE

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4 New York, New York 10016

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5 Counsel for Plaintiff

6

HUGHES, HUBBARD & REED, LLP.

7 BY: NED H. BASSEN, ESQUIRE

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8 New York, New York, 10004-1482

212.837.6090

9 Counsel for Defendant

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1 identification.)

2 BY MS. NEILAN:

3 Q. The reporter has just handed you

4 Carro Number 1. Have you seen this

5 document before?

6 A. Yes.

7 Q. And can you turn to page 2? Do you

8 see that it lists five different topics?

9 A. Yes.

10 Q. The first topic is "Defendant's

11 policies and practices concerning

12 compensation of all executives, managers

13 or comparable positions with different

14 titles, class members, with respect to

15 overtime compensation."

16 Do you understand that?

17 A. Yes.

18 Q. And are you qualified to speak to

19 this topic?

20 A. Yes.

21 Q. For what time period are you

22 qualified to speak for the topic?

23 A. For the time period from my

24 employment forward.

25 Q. What is that time period?

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1 A. November 2004.

2 Q. Are you qualified to speak to those
3 topics from October 2001 to November 2004?

4 A. Not completely, no.

5 Q. Do you see that the second topic is
6 listed as "Defendant's policies and
7 practices concerning classification of
8 Class Members as exempt from the overtime
9 provisions of the Fair Labor Standards Act
10 and the New York Labor Law?

11 A. Yes.

12 Q. Do you understand that?

13 A. Yes.

14 Q. Are you qualified to speak to this
15 topic?

16 A. Yes.

17 Q. For what time period are you
18 qualified?

19 A. From my employment date forward.

20 Q. Are you qualified to speak to topic
21 number 2 from November 2004 to the present?

22 A. Correct.

23 Q. Are you qualified to speak to topic
24 number 2 from October 2001 to November
25 2004?

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1 A. Not completely.

2 Q. The third topic, "Defendant's
3 policies and practices concerning
4 reclassification of Class Members as
5 non-exempt from the overtime provisions of
6 the Fair Labor Standards Act and the New
7 York Labor Law," do you understand that?

8 A. Yes.

9 Q. Are you qualified to speak to this
10 topic?

11 A. Yes.

12 Q. For what time period?

13 A. From the date of my employment
14 forward.

15 Q. So, you are qualified to speak to
16 number three from November 2004 to the
17 present?

18 A. Yes.

19 Q. Are you qualified to speak to topic
20 number 3 from October 2001 through
21 November 2004?

22 A. Not completely.

23 Q. When you say "not completely," what
24 do you mean?

25 A. I may have pieces of information as